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October 29, 2021

Via ECF

Hon. Ramon E. Reyes, Jr., U.S.M.J. United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. N208
Brooklyn, New York 11201

Re: Kim v. New York Meat Inc. et al., 21-CV-01422

Dear Judge Reyes, Jr.,

This office represents the plaintiff in the above-captioned matter. Pursuant to your honor's order entered on October 28, 2021, parties submit their status report in the above-referenced matter jointly.

[Plaintiff's position]

Plaintiff reached out to Defendants' counsel to request their consent to file an amended complaint but defendants refused. Therefore, Plaintiff filed a letter motion along with the proposed 1st amended complaint seeking leave of court to file the amended complaint. As soon as the Court grants plaintiff's motion, Plaintiff will file the amended complaint and plans to move for collective action and issue discovery requests.

[Defendants' position]

Defendants served their Rule 26 Disclosures along with Demand for Responses to Interrogatories, Document Demand, and Notice of Deposition on August 5, 2021. The deposition of Plaintiff was noticed for September 17, 2021.

Plaintiff's counsel contacted our office on September 14, 2021, to confirm the September 17, 2021, deposition of the plaintiff. Our response was that since we did not receive responses to discovery demands served on August 5, 2021, the deposition of Plaintiff would be rescheduled to a date after responses were provided. There has been no activity since.

Sincerely,

/s/ Ryan J. Kim
Ryan J. Kim

Cc: Jonathan Sue